REMARKS

Claims 1-43 are currently pending, with claims 1, 10 and 16 being the independent claims. Claims 1-43 have been amended. The amendment to the claims are to correct minor claim wording, and are cosmetic in nature. Reconsideration of the rejection is respectfully requested.

Initially, it is noted that the Office Action refers (pg. 2) to GB 2 280 <u>285</u>. This patent document is unrelated to the subject matter of the present application. It is assumed that the Office Action instead refers to GB 2 280 <u>085</u> which was cited in the Information Disclosure statement dated December 13, 2002.

The Office Action (pg. 1, ¶ 12 (3)) indicates that only "some" of the priority documents were received in the U.S.P.T.O. file wrapper for this application. Although it is indicated otherwise, no such identification appears in the Office Action. Appropriate identification of the missing documents is requested, or an indication is requested that all necessary documents have been received by the U.S.P.T.O. to perfect the claim for foreign priority.

In the March 3, 2003 Office Action, independent claims 1, 10 and 16, and dependent claims 2-9, 11-15 and 17-43 were rejected as being unpatentable over GB 2 280 085 ("*McCombe*") in view of U.S. Patent No. 6,301,471 ("*Dahm*"). Applicant respectfully requests reconsideration of the rejection of the claims in view of the following remarks.

The present claimed invention relates to a system and method for identifying a subscriber of a first network in a second network, where an address of the second network is allocated to the subscriber. Mapping information between the address of the second network and the identity of the subscriber is generated and supplied to the second network. A client server connection is achieved via the mapping information, which allows the actual subscriber identity of a dynamic address of the second network to be handled over the second network. The second network uses the mapping of the address of the second network and the subscriber identity to identify the subscriber (see pg. 4, lines 28 thru pg. 5, lines 3 of the specification).

In contrast, *McCombe* relates to a method for enabling a subscriber to an AMPS network to be identified for roaming in a GSM network (see Abstract). *McCombe* (lines 4-5 of the Abstract) states, a subscriber is provided with a temporary smart card bearing an international mobile subscriber identity (IMSI) number that identifies the subscriber as someone who is

visiting a primary (GSM) network, as well as someone who is registered with an AMPS network. *McCombe* further states, if the subscriber activates his handset in the GSM network, the network recognizes the subscriber as an AMPS/D-AMPS subscriber and, via a communication link, extracts subscriber data for a home locator (HLR) in the AMPS network and stores this information in a visitor location register (VLR) associated with the GSM network (see lines 6-10 of the Abstract).

McCombe fails to teach or suggest the invention set forth in independent claim 1, i.e., the use of VAS platforms to identify a mobile station accessing services of the VAS platform. More, specifically, *McCombe* fails to disclose the step of "generating information about a mapping between an address of a subscriber in a second network and a subscriber identity, where the subscriber is identified in a VAS platform based on the mapping information," as recited in independent method claim 1. *McCombe* only discloses how to identify a mobile subscriber in a mobile network that is visited by the subscriber.

The Office Action (pg. 2, ¶ 3) states:

> McCombe teaches an authentication method/service device for identifying a subscriber of a first network (2) in a second network, wherein authentication server functionality for a VAS platform is provided...
>
> McCombe does not explicitly teach identifying a subscriber in the VAS platform based on the mapping info.
>
> However, Dahm dislcoses:
>
> c) transmitting the mapping to said second network (Dahm col. 8, lines 15-20, and col. 9 lines 58-col.10 lines 4; subscriber ID, proxy server transmitting mobile phone subscriber's request with subscriber ID), wherein said subscriber is identified in the VAS platform based on said mapping information (Dahm col. 10 lines 20-24; subscriber is identified and VAS is provided in the second server to the identified subscriber), wherein said authentication client means (52) is a RADIUS client (Dahm Fig. 4 No. 440; remote second network server).
>
> Therefore, it would have been obvious to one having ordinary skill in the art at the time the invention was made to employ the teachings of Dahm within the system of McCombe because it would identify a subscriber from the second network server and the second network server offers a value added service to the identified subscriber of the first network.

Dahm relates to a system for providing appropriate mobile services to subscribers (see col. 1, lines 7-8). *Dahm* (col. 2, lines 20-24) states, the system allows mobile subscribers who

are identified as likely candidates for churning, to efficiently, visually and interactively, review an offer for a mobile service plan which better meets their needs. According to *Dahm*, a subscriber can review and execute the offer using the display and interface of a mobile device (see col. 2, lines 26-28). However, *Dahm* fails to teach or suggest the step of "generating information about a mapping between an address of a subscriber in a second network and the subscriber identity, where the subscriber is identified in a VAS platform based on the mapping information," as recited in independent method claim 1. Hence, *Dahm* fails to cure the deficiency of *McCombe*.

Dahm (col. 8, lines 15-20) discloses that for a request made from a mobile device to receive specific information of a server of one network (i.e. the landnet 410 of Fig. 4), a device ID or a subscriber ID thereof must be included for authentication. *Dahm* teaches (col. 9, line 58 to col. 10, line 4) how information is exchanged between the mobile device and a customer service server 440 (see Fig. 4). However, this section of *Dahm* fails to teach or suggest that mapped information is transmitted to a second network. In *Dahm*, the second network would be the landnet 410.

Moreover, *Dahm* fails to even hint at a reason for performing the claimed mapping recited in applicant's independent claim 1. *Dahm* (col. 10, lines 20-24) states, a loyalty server module can further identify those customers who have been identified as being susceptible to churning and can automatically generate an offer for a value-added service package to those customers. This is the only passage in *Dahm* in which a VA is even mentioned. However, in this passage, only an offer for VAS packages is provided, but no description of the VAS itself is provided. *Dahm* only teaches the identification of customers to which such an offer should be provided. Hence, *Dahm* fails to teach or suggest the generation of information about the mapping between the address of the subscriber in the second network and a subscriber identity, and that the mapping information is used to identify a subscriber in a VAS platform, as recited in independent claim 1. Consequently, *Dahm* fails to cure the deficiency of *McCombe*. Therefore, independent claim 1 is patentable over system achieved by the combination of *McCombe* and *Dahm*, and therefore withdrawal of the rejection under 35 U.S.C. §103 is in order, and a notice to that effect is earnestly solicited.

Independent claims 10 and 16 are apparatus claims associated with the method of independent claim 1. Accordingly, independent claims 10 and 16 are patentable over the

combination of the cited references for the reasons discussed above with respect to independent method claim 1.

In view of the patentability of independent claims 1, 10 and 16, for the reasons set forth above, dependent claims 2-9, 11-15 and 17-43 are all patentable over the prior art.

Based on the foregoing amendments and remarks, this application should be in condition for allowance. Early passage of this case to issue is respectfully requested.

Respectfully submitted,

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Dated: June 22, 2005